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Attorney for defendant David Reid

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

CR-05-1849-8 JCH

vs.

DAVID REID,

Defendant.

THIRD MOTION FOR MODIFICATION OF CONDITIONS
OF RELEASE (UNOPPOSED)

Defendant David Reid, by his counsel undersigned, hereby moves this Court for an Order modifying his conditions of release, which were previously set. Pretrial Services has made the recommendation Mr. Reid be released on his own recognizance. Mr. Reid has been on pretrial supervision for several years now and counsel is informed that he has not had any problems. He has been subject to random urinalysis, and has not had any positive tests. In any event, he will continue to be subject to

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1 random urinalysis for his employment as a pilot. He is already allowed to
 2 travel outside of the United States, and has done so and returned several
 3 times, demonstrating that he is not a flight risk. There is no allegation that
 4 he presents a danger. Accordingly, pre-trial supervision is not required.
 5

6 Counsel has contacted Ms. Monica Hoyle, the supervising Pre-Trial
 7 Services officer in Albuquerque, and Ms. Claudette Thomas, the Pre-Trial
 8 Services Officer in Phoenix, Arizona who is providing courtesy supervision.
 9 Neither has any objection to this request. James Braun, the Assistant
 10 United States Attorney handling this matter, also has no objection to the
 11 entry of this Order. Therefore, the Court is respectfully urged to modify Mr.
 12 Reid's conditions to release on his own recognizance.
 13
 14

15 Because there is no objection from the Government, no hearing is
 16 requested on this matter.
 17

18 RESPECTFULLY SUBMITTED this 19th day of August, 2008.

19 LAW OFFICES OF
 20 NASH & KIRCHNER, P.C.

21 BY /s/ Walter Nash
 22 WALTER NASH
 Attorney for Defendant Reid

23 CERTIFICATE OF SERVICE

24 I hereby certify that on this 19th day of August,
 25 2008, I filed the foregoing motion electronically
 through the CM/ECF system, which caused
 26 counsel for the Government and other parties to be
 served by electronic means, as more fully reflected in
 the Notice of Electronic Filing. I further certify
 that I caused copies of this pleading to be sent to:

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Ms. Monica Hoyle
(PTS, New Mexico) by email at
monica_hoyle@nmcourt.fed.us

Ms. Claudette Thomas (PTS, Arizona) by
email at claudette_thomas@azd.uscourts.gov

Electronically filed

Walter Nash